

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION

Nathan Ochsner, Clerk of Court

October 17, 2023

UNITED STATES OF AMERICA

v.

ANTONIO OSIEL CASAREZ  
GERARDO RAFAEL PEREZ JR.§  
§  
§  
§

CRIMINAL NO. L-23-CR-1237

**MGM****INDICTMENT****THE GRAND JURY CHARGES THAT:****Introduction**

At various times relevant to the Indictment,

1. The term “firearm” means: 1) any weapon which will or is designed to or may readily be converted to expel a projectile by the action of an explosive, and 2) the frame or receiver of any such weapon.
2. The term “dealer” means any person engaged in the business of selling firearms at wholesale or retail.
3. The term “licensed dealer” means any dealer who is licensed under the provisions of Chapter 44 of Title 18, United States Code.
4. CCF Tactical LLC is a Federal Firearms Licensees (FFL) under the provisions of Chapter 44 of Title 18, United States Code.
5. The term “indictment” includes an indictment or information in any court under which a crime punishable by imprisonment for a term exceeding one year may be prosecuted.

**COUNT ONE**

On or about September 23, 2023, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**GERARDO RAFAEL PEREZ JR.,**

in connection with the acquisition of one and more of the firearms below:

	<b>DATE</b>	<b>MAKE &amp; MODEL</b>	<b>CALIBER</b>	<b>SERIAL NUMBER</b>
1.	September 23, 2023	FNH USA SCAR 17	.308 Caliber rifle	H1C25320

from CCF Tactical LLC, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made a false and fictitious oral and written statement to CCF Tactical LLC, which statement was intended and likely to deceive CCF Tactical LLC, as to a fact material to the lawfulness of such acquisition of the said firearms to the Defendants under Chapter 44 of Title 18, in that **GERARDO RAFAEL PEREZ JR.** represented on a ATF Form 4473 that he resided at a residence on the 600 block of Hortensia Lane, Laredo, Texas, when in fact as **GERARDO RAFAEL PEREZ JR.** knew, he resided at a residence on the 200 block of Salamanca Avenue, Laredo, Texas,

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and Section 2.

**COUNT TWO**

On or about September 26, 2023, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**ANTONIO OSIEL CASAREZ,**

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit, fifty-two rounds of 8 millimeter Romanian ammunition, and the ammunition was in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**NOTICE OF FORFEITURE**

**18 U.S.C. §922(a) and (g)  
(Counts 1 and 2)**

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendant,

**ANTONIO OSIEL CASAREZ AND  
GERARDO RAFAEL PEREZ JR.,**

that upon conviction of a violation of Title 18, United States Code, Section 922(a) or (g), all firearms/ammunition involved in said violations are subject to forfeiture, including but not limited to the following:

	<b>MAKE &amp; MODEL</b>	<b>CALIBER</b>	<b>SERIAL NUMBER</b>
1.	52 Rounds Romanian Ammunition	8 mm	N/A

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

ALAMDAR S. HAMDANI  
UNITED STATES ATTORNEY



\_\_\_\_\_  
Steven Chamberlin  
Assistant United States Attorney

USA-74-24b  
(Rev. 6-1-71)

**CRIMINAL DOCKET**

NO. L-23-CR-1237

LAREDO DIVISION

FILE: 23-06172  
INDICTMENT

MAG#: 23-01851 & 23-001852  
Filed: October 17, 2023

**MGM**  
Judge: \_\_\_\_\_

ATTORNEYS:

UNITED STATES OF AMERICA

VS.

ALAMDAR S. HAMDANI, USA  
STEVEN CHAMBERLIN, AUSA

**ANTONIO OSIEL CASAREZ  
GERARDO RAFAEL PEREZ JR.**

**CHARGES:**

Count 1: False Statement During Purchase of a Firearm  
[18 USC 922(a)(6), 924(a)(2)]

Count 2: Possession of Firearm and Ammunition by a person having been convicted of a crime punishable by imprisonment for a term exceeding one year  
[18 USC 922(g)(1), 924(a)(8)]

Notice of Forfeiture

**TOTAL COUNTS: 2**

**PENALTY:**

Ct. 1: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment,  
Not more than a three three-year term of supervised release

Ct. 2: 0 to 15 years and/or \$250,000 Fine, \$100 special assessment,  
Not more than a three (3)-year term of supervised release